

### **REMARKS**

Claims 18-37 are pending in the application. Applicants respectfully request reconsideration of the rejections set forth in the Final Action based on the following remarks.

#### **Drawing Objections**

The Examiner states that the “drawings are objected to because the unlabelled rectangular boxes in figures 1, 2, and 6 should be provided with descriptive text labels”. However, each box in figures 1, 2, and 6 is provided with a numerical label. Further each numerical label is described in Applicant’s disclosure. In any event, there is no requirement in the Patent Laws that requires descriptive text labels be added in addition to numerical labels. Under 37 C.F.R. 1.81, an applicant for a patent is merely required to furnish a drawing of his or her invention where necessary for the understanding of the subject matter sought to be patented. The inventions can be understood with reference to the figures since each of the numerical labels are described in Applicant’s disclosure.

Accordingly, withdrawal of the objections to the drawings is respectfully requested.

#### **Claim Rejections- 35 U.S.C. § 112**

Claim 16 stands rejected under 35 U.S.C. 112, first paragraph. Claim 16 has been cancelled without prejudice. Withdrawal of the objection under 35 U.S.C. 112, first paragraph is respectfully requested.

#### **Claim Rejections- 35 U.S.C. § 103**

Claims 1-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Pub. 2003/0231588 to Roth in view of U.S. Patent 5,500,858 to McKeown, set forth by in pages 4-8 of the Final Action.

While Applicants generally disagree with the rejections, claims 1-16 have been cancelled

without prejudice. Claims 18-37 are added. It is respectfully submitted that at the very least, Roth and McKeown, alone or in combination, does not disclose claims 18, 25 and 35.

For example, it is respectfully submitted that at the very least, the combination of Roth and McKeown does not disclose or suggest, *“providing a plurality of requests to transmit data packets from a plurality of devices, wherein each request corresponds to one of a plurality of input queues of one of the devices and includes an output port identifier for transmitting data packets to one of a plurality of output ports”, “receiving the requests in parallel at respective inputs of a plurality of allocation stages, wherein an output of each stage is connected to an input of a subsequent stage” and “at least one of the allocation stages performing a matching based on the requests”* as recited in claim 18.

Roth merely teaches a source arbiter (27) that receives weights from a subset of input nodes (12) and grants permission to the input node (12) with the highest weight. The weights are not the same as the claimed requests because they do not include an output port identifier. Further, there is no disclosure in Roth of the source arbiter (27) including a plurality of allocation stages, wherein an output of each stage is connected to an input of a subsequent stage. While Roth teaches a collection of destination arbiters (22) in FIG. 2, there is no disclosure in Roth of the arbiters being daisy chained together. Further, there is no disclosure in Roth of the destination arbiters (22) receiving requests in parallel, much less requests that include output identifiers.

The deficiencies of Roth with respect to *providing a plurality of requests to transmit data packets from a plurality of devices, wherein each request corresponds to one of a plurality of input queues of one of the devices and includes an output port identifier for transmitting data packets to one of a plurality of output ports”, “receiving the requests in parallel at respective inputs of a plurality of allocation stages, wherein an output of each stage is connected to an*

*input of a subsequent stage” and “at least one of the allocation stages performing a matching based on the requests” is not cured by McKeown. For example, McKeown merely teaches (in col. 4, line 63-col.5, line 5) uses a rotating priority scheme that matches inputs to outputs based on the input requests with the highest priority. There is no disclosure in McKeown of the input requests including an output port identifier. Further there is no disclosure in McKeown of a plurality of allocation stages that receive the requests in parallel at their inputs, and the output of each stage being connected to an input of a subsequent stage. While McKeown teaches (in FIG. 1) a collection of Scheduler Units 90A-90N, the units are not daisy chained together. Further, all the requests are not sent in parallel to each of the units. For example, McKeown teaches (in FIG. 1) that a separate request is sent to each unit.*

For at least the foregoing reasons, claim 18 is believed to be patentable over the combination of Roth and McKeown. Claims 19-24 are believed to be patentable over said combination at least by virtue of their dependence from claim 18.

Claim 25 and 35 are believed to be patentable over Roth and McKeown at least for reasons similar to claim 18. For example, claim 25 recites “*a plurality of allocation stages connected in series, wherein an output of each stage is connected to an input of a subsequent stage*” and claim 35, recites “*transferring partial matching information from each stage of a plurality of allocation stages to a subsequent stage, wherein an output of each stage is connected to an input of a subsequent stage*”. Claims 25-34 and 36-28 are believed to be patentable over said combination at least by virtue of respective dependencies from claims 25 and 35.

Withdrawal of the rejections under 35 U.S.C. 103(a) is respectfully requested.

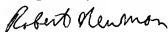
**Conclusion**

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

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Respectfully submitted,



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